

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**BOKF, NA AND BOK FINANCIAL
SECURITIES, INC.,**

PLAINTIFFS,

V.

VICKIE SUE WISE, RONNIE CARROLL "SKIP"
DAVIS, MELISSA MORGESON DEL-CID,
HILLTOP HOLDINGS, INC., HILLTOP
SECURITIES, INC., HILLTOP SECURITIES
INDEPENDENT NETWORK INC., NATIONAL
LLOYDS INSURANCE COMPANY, AMERICAN
SUMMIT INSURANCE COMPANY, AND
PLAINS CAPITAL BANK.

CIVIL No. 3:18-cv-00794

DEFENDANTS.

DECLARATION OF MELISSA MORGESON DEL-CID

STATE OF TEXAS §
COUNTY OF DALLAS §

Melissa Morgeson Del-Cid, being duly sworn and deposed, states as follows:

1. "My name is Melissa Morgeson Del-Cid. I am over 18 years of age, and I am fully competent to make this Affidavit. I am a resident of Dallas County, Texas. I have never been convicted of a felony or crime of moral turpitude. I am competent in all respects to make this Affidavit. All statements herein are within my personal knowledge and are true and correct.

2. From June 2006 to March 23, 2018, I worked for BOK Financial Securities, Inc. ("BOK"), most recently as a Senior Sales and Services Specialist. I have read the Application for Temporary Restraining Order filed by BOK against me. I did not print any documents

related to customers, including confidential customer information, in anticipation of my resignation. During the week of March 9-16, 2018, I conducted business as usual; any documents printed by me that week were printed in the usual and ordinary course of business. It would not be unusual for me to print documents in anticipation of or in preparation for client meetings or client telephone calls. This is particularly true during annual account reviews and tax season. The volume of printing attributed to me for the week of March 9-16 does not appear to be unusually large for my normal business routine and, based on the information in the Complaint, was done during normal business hours.

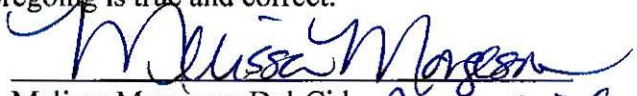
3. On March 23, 2018 at approximately 8:30 a.m., I emailed my written resignation to Lisa Shannon, my supervisor, telephoned her to let her know I was resigning effective immediately, and had Vickie Wise deliver to BOK's branch manager, Patrick Staudt, my BOK badges and keys. Prior to and in anticipation of my resignation, I did not download or e-mail myself any BOK information or documents. I did not download or e-mail myself any client's financial records. I turned in all BOK property in my possession. I did not take any documents or other information belonging to BOK in anticipation of my resignation.

4. I have not directly solicited any BOK customers since my departure. My only contact with BOK customers since my departure has been in an administrative support capacity after they spoke to Vickie Wise.

5. I have not asked any client to transfer his or her account to Hilltop. I have not possessed, used, or accessed any BOK documents or information since my resignation. Any contact information for clients currently in my possession was obtained by searching publicly available sources on the internet.

FURTHER DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct.


Melissa Morgeson Del-Cid

Executed on the 5th day of April, 2018.